

9/28/07
#10007955

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

-----X
ANGELO DEMERI and DORIS DEMERI,

Plaintiff(s),

-against-

A.W. CHESTERTON COMPANY,
AMCHEM PRODUCTS, INC.,
n/k/a RHONE POULENC AG COMPANY,
n/k/a BAYER CROPSCIENCE INC.,
AMERICAN STANDARD, INC.,
ANCHOR PACKING COMPANY,
AQUA-CHEM, INC.,
AURORA PUMP COMPANY,
BEAZER EAST, INC.,
f/k/a KOPPERS INDUSTRIES,
BELL & GOSSETT COMPANY,
BMCE INC.,
f/k/a UNITED CENTRIFUGAL PUMP,
BORDEN CHEMICAL, INC.,
BORDEN, INC.,
BORG WARNER INDUSTRIAL PRODUCTS,
a/k/a BW/IP INTERNATIONAL,
BUFFALO PUMPS, INC.,
BURNHAM, LLC,
Individually, and as successor to
BURNHAM CORPORATION,
BW/IP INTERNATIONAL, INC.,
f/k/a BORG WARNER INDUSTRIAL PRODUCTS
successor to BYRON JACKSON PUMPS,
CARRIER CORPORATION,
Individually, and as successor in interest to
BRYANT HEATING & COOLING SYSTEMS,
CBS CORPORATION, a Delaware Corporation,
f/k/a VIACOM INC. successor by merger to CBS
CORPORATION, a Pennsylvania Corporation,
f/k/a WESTINGHOUSE ELECTRIC CORPORATION,
CENTRAL HUDSON GAS & ELECTRIC,
CERTAIN TEED CORPORATION,
CLEAVER BROOKS COMPANY, INC.,
CONSOLIDATED EDISON COMPANY
OF NEW YORK, INC.,
COURTER & COMPANY INCORPORATED,
CRANE CO.,
CRANE COMPANY,
Individually and as successor to
Mark Controls Corporation and as
successor to Pacific Valves,

Index No.: 112888-07

Date Filed: 9/24/07

Plaintiff Designates
NEW YORK
County as the Place of Trial

The Basis of Venue is
Defendants' Place of Business

SUMMONS

NEW YORK
COUNTY CLERK'S OFFICE

SEP 24 2007

NOT COMPARED
WITH COPY FILE

CRANE PUMPS & SYSTEMS, INC., WEINMAN DIVISION,
CRANE PUMPS & SYSTEMS, INC.,
as successor to BURKS PUMPS, INC.,
CROLL REYNOLDS ENGINEERING CO., INC.,
DB RILEY, INC.,
DUNHAM-BUSH, INC.,
DURABLA MANUFACTURING COMPANY,
EASTERN REFRACTORIES COMPANY, INC.,
ECOLAIRE INCORPORATED,
ELLIOTT TURBOMACHINERY CO., INC.,
EMPIRE-ACE INSULATION MFG. CORP.,
FAIRBANKS-MORSE PUMP CORPORATION,
FEDERAL PUMP CORPORATION,
FOSTER WHEELER, L.L.C.,
GARDNER DENVER, INC.,
GARLOCK SEALING TECHNOLOGIES LLC,
f/k/a GARLOCK INC.,
GENERAL ELECTRIC COMPANY,
GENERAL MOTORS CORPORATION,
GOODYEAR CANADA, INC.,
GOODYEAR TIRE AND RUBBER COMPANY,
GOULDS PUMPS, INC.,
H.B. FULLER COMPANY,
H.B. SMITH COMPANY, INCORPORATED,
HEXION SPECIALTY CHEMICALS, INC.,
individually and a successor-on-interest to
THE BORDEN'S CONDENSED MILK COMPANY,
THE BORDEN COMPANY, BORDEN, INC. and
BORDEN CHEMICAL, INC.,
IMO INDUSTRIES, INC.,
INGERSOLL-RAND COMPANY,
INTERNATIONAL BUSINESS MACHINES CORPORATION,
ITT INDUSTRIES INC.,
J.H. FRANCE REFRACTORIES COMPANY,
KARNAK CORPORATION,
KENNEDY VALVE MANUFACTURING Co., Inc.,
MILTON ROY COMPANY,
MINNESOTA MINING & MANUFACTURING COMPANY,
OAKFABCO, INC.,
ORANGE & ROCKLAND UTILITIES, INC.,
OWENS-ILLINOIS, INC.,
PATTERSON PUMP COMPANY,
PEERLESS INDUSTRIES, INC.,
PREMIER REFRACTORIES, INC.,
f/k/a ADIENCE, INC., f/k/a BMI,
RAPID-AMERICAN CORPORATION,
RESEARCH CORPORATION,
RESEARCH-COTTRELL, INC.,
REXNORD CORPORATION,
Individually, and as successor to FALK CORPORATION,
REYNOLDS METALS COMPANY,
Individually and as successor in interest to ATLANTIC

ASBESTOS CORP.,
ROBERT A. KEASBEY COMPANY,
SEQUOIA VENTURES, INC.,
f/k/a BECHTEL CORPORATION,
THE FAIRBANKS COMPANY,
TREADWELL CORPORATION,
U.S. RUBBER COMPANY (UNIROYAL),
UNION CARBIDE CORPORATION,
UNITED CONVEYOR CORPORATION,
VIAD CORP., Individually, and as successor in interest to
GRISCOM RUSSEL CO.,
WARREN PUMPS, INC.,
WEIL-MCLAIN,
a division of THE MARLEY COMPANY,

Defendants.

-----X
To the above named Defendant(s)

You are hereby summoned to answer the **verified** complaint in this action and to serve a copy of your answer, or, if the complaint is not served with this summons, to serve a notice of appearance, on the Plaintiff's Attorney(s) within 20 days after the service of this summons, exclusive of the day of service (or within 30 days after the service is complete if this summons is not personally delivered to you within the State of New York); and in case of your failure to appear or answer, judgment will be taken against you by default for the relief demanded in the complaint.

Dated, September 24, 2007
New York, New York

Defendant's address:

SEE ATTACHED DEFENDANTS RIDER

WEITZ & LUXENBERG, P.C.
Attorney(s) for Plaintiff
Post Office Address
180 Maiden Lane
New York, New York 10038
(212) 558-5500

DEFENDANTS' RIDER

A.W. CHESTERTON COMPANY

Joseph E. Riley
225 Fallon Road
Stoneham, MA 02180

AMCHEM PRODUCTS, INC.,

n/k/a RHONE POULENC AG COMPANY,

n/k/a BAYER CROPSCIENCE INC.

41 State Street
Albany, NY 11207

AMERICAN STANDARD, INC.

Michele Corcoran, New Filings Manager
c/o PACE
1009 Lenox Drive, Bldg 4 Suite 101
Lawrenceville, NJ 08648

ANCHOR PACKING COMPANY

CT Corporation System
1635 Market Street
Philadelphia, PA 19103

AQUA-CHEM, INC.

7800 North 113th Street
Milwaukee, WI 53224

AURORA PUMP COMPANY

13515 Ballantyne Corporate Place
Charlotte, NC 28277

BEAZER EAST, INC.,

f/k/a KOPPERS INDUSTRIES

One Oxford Centre, Suite 3000
Pittsburgh, PA 15219

BELL & GOSSETT COMPANY

8200 North Austin Avenue
Morton Grove, IL 60053

BMCE INC.,

f/k/a UNITED CENTRIFUGAL PUMP

Weiner Lesniak LLP
Anna M. DiLonardo
888 Veterans Memorial Highway
Hauppague, NY 11788

BORDEN CHEMICAL, INC.

C/O THE PRENTICE-HALL CORPORATION SYSTEM, INC.
80 STATE STREET
Albany, NY 12207

BORDEN, INC.
180 E. BROAD STREET
Columbus, OH 43215-3709

BORG WARNER INDUSTRIAL PRODUCTS,
a/k/a BW/IP INTERNATIONAL
Unknown at Present Time

BUFFALO PUMPS, INC.
874 OLIVER STREET
N. TONAWANDA, NY 14120

BURNHAM, LLC,
Individually, and as successor to
BURNHAM CORPORATION
1239 Harrisburg Pike
Lancaster, PA 17603

BW/IP INTERNATIONAL, INC.,
f/k/a BORG WARNER INDUSTRIAL PRODUCTS
successor to BYRON JACKSON PUMPS
200 South Michigan Avenue
Chicago, IL 60604

CARRIER CORPORATION,
Individually, and as successor in interest to
BRYANT HEATING &
COOLING SYSTEMS
CT Corporation System
111 8th Avenue
New York, NY 10011

CBS CORPORATION, a Delaware Corporation,
f/k/a VIACOM INC. successor by merger to CBS
CORPORATION, a Pennsylvania Corporation,
f/k/a WESTINGHOUSE ELECTRIC CORPORATION
Asbestos Litigation Support Manager
ECKERT SEAMANS CHERIN & MELLOTT, LLC
Case Management & Technology Center
USX Towers
600 Grant Street
Pittsburgh, PA 15219

CENTRAL HUDSON GAS & ELECTRIC
Gas & Electric Corporation
284 South Avenue
Poughkeepsie, NY 12601

CERTAIN TEED CORPORATION
CT Corporation System
111 8th Avenue
New York, NY 10011

CLEAVER BROOKS COMPANY, INC.

11950 West Park Place
Milwaukee, WI 11270

**CONSOLIDATED EDISON COMPANY
OF NEW YORK, INC.**

4 Irving Place
New York, NY 10003

COURTER & COMPANY INCORPORATED

McGivney, Kluger & Gannon
C/O Richard E. Leff, Esq.
80 Broad Street, 23rd Floor
New York, NY 10004

CRANE CO.

100 First Stamford Place
Stamford, CT 06902

CRANE COMPANY,

Individually and as successor to
Mark Controls Corporation and as
successor to Pacific Valves

100 First Stamford Place
Stamford, CT 06902

CRANE PUMPS & SYSTEMS, INC., WEINMAN DIVISION

CT Corporation
1300 East Ninth Street
Cleveland, OH 44114

**CRANE PUMPS & SYSTEMS, INC.,
as successor to BURKS PUMPS, INC.**

420 3rd Street
Piqua, OH 45356

CROLL REYNOLDS ENGINEERING CO., INC.

2400 Reservoir Avenue
Trumbull, CT 06611

DB RILEY, INC.

CT Corporation System
111 8th Avenue
New York, NY 10011

DUNHAM-BUSH, INC.

175 South Street
West Hartford, CT 06110-1928

**DURABLA MANUFACTURING COMPANY
CLEMENTE, MUELLER & TOBIA, P.A.**

218 Ridgedale Avenue
P.O. Box 1296
Morristown, NJ 07962

EASTERN REFRACTORIES COMPANY, INC.
McMAHON, MARTINE & GALLAGHER
90 Broad Street
14th Floor
New York, NY 10004

ECOLAIRE INCORPORATED
C.T. CORPORATION SYSTEMS
101 FEDERAL STREET
Boston, MA 02110

ELLIOTT TURBOMACHINERY CO., INC.
CT Corporation System
1515 Market Street
Philadelphia, PA 19103

EMPIRE-ACE INSULATION MFG. CORP.
c/o THE SECRETARY OF STATE
41 State Street
Albany, NY 12207

FAIRBANKS-MORSE PUMP CORPORATION
3601 Fairbanks Avenue
Kansas City, KS 66106

FEDERAL PUMP CORPORATION
Charles S. Bierner
WOLF, BLOCK, SCHORR & SOLIS-COHEN, LLP
250 Park Avenue
New York, NY 10177

FOSTER WHEELER, L.L.C.
Route 173 at Frontage Road
Clinton, NJ 08809

GARDNER DENVER, INC.
1800 Gardner Expressway
Quincy, IL 62301

GARLOCK SEALING TECHNOLOGIES LLC,
f/k/a **GARLOCK INC.**
CT Corporation System
111 8th Avenue
New York, NY 10011

GENERAL ELECTRIC COMPANY
Electric Insurance Company
75 Sam Fonzo Drive
Beverly, MA 01915

GENERAL MOTORS CORPORATION

CT Corporation Systems
111 8th Avenue
New York, NY 10011

GOODYEAR CANADA, INC.

450 Kipling Avenue
Atobicoke, Ontario CANADA M8ZSE1

GOODYEAR TIRE AND RUBBER COMPANY

Corporation Service Company
1133 Avenue of the Americas
Suite 3100
New York, NY 10036

GOULDS PUMPS, INC.

240 Fall Street
Seneca Falls, NY 13148

H.B. FULLER COMPANY

Charles Becker, Esq.
Meagher & Geer
4200 Multifoods Tower
33 South Sixth Street
33 South Sixth Street
Minneapolis, MN 55402-3788

H.B. SMITH COMPANY, INCORPORATED

260 North Elm Street
Westfield, MA 01085

HEXION SPECIALTY CHEMICALS, INC.,

individually and a successor-on-interest to
**THE BORDEN'S CONDENSED MILK COMPANY,
THE BORDEN COMPANY, BORDEN, INC. and
BORDEN CHEMICAL, INC.**

180 E. BROAD STREET
Columbus, OH 43215-3709

IMO INDUSTRIES, INC.

997 Lenox Drive
Suite 111
Lawrenceville, NJ 08648

INGERSOLL-RAND COMPANY

CT Corporation Systems
111 8th Avenue
New York, NY 10011

INTERNATIONAL BUSINESS MACHINES CORPORATION

New Orchard Road
Armonk, NY 10504

ITT INDUSTRIES INC.

CT Corporation System
111 8th Avenue
New York, NY 10011

J.H. FRANCE REFRACTORIES COMPANY

SPECIAL CLAIMS SERVICES, INC.

809 Coshocton Avenue
Suite 1
Mount Vernon, OH 43050-1931

KARNAK CORPORATION

330 Central Avenue
Clark, NJ 07066

KENNEDY VALVE MANUFACTURING Co., Inc.

1021 East Water Street
Elmira, NY 14901

MILTON ROY COMPANY

201 Ivyland Road
Warminster, PA 18974

MINNESOTA MINING & MANUFACTURING COMPANY

CT Corporation System
111 8th Avenue
New York, NY 10011

OAKFABCO, INC.

705 McKnight Park Drive
Pittsburgh, PA

ORANGE & ROCKLAND UTILITIES, INC.

1 Blue Hill Plaza
Pearl River, NY 10965

OWENS-ILLINOIS, INC.

One Michael Owens Way
Perrysburg, OH 43551

PATTERSON PUMP COMPANY

9201 Ayersville Road
Toccoa, GA 30577-9033

PEERLESS INDUSTRIES, INC.

Carol Martindell
McGivney & Kluger, P.C.
23 Vreeland Road, Suite 220

Florham Park, NJ 07932

PREMIER REFRACTORIES, INC.,
f/k/a ADIENCE, INC., f/k/a BMI
Special Claims Services, Inc.
809 Coshocton Avenue, Suite 1
Attention: Donald E. Ward, President
Mount Vernon, OH 43050

RAPID-AMERICAN CORPORATION
2711 Centerville Road
Wilmington, DE 19808

RESEARCH CORPORATION
4703 East Camp Lowell Drive
Suite 201
Tucson, AZ 85712

RESEARCH-COTTRELL, INC.
C T CORPORATION SYSTEM
111 EIGHTH AVENUE
New York, NY 10011

REXNORD CORPORATION,
Individually, and as sucesor to FALK CORPORATION

4701 W. Greenfield Avenue
Milwaukee, WI 53214

REYNOLDS METALS COMPANY,
Individually and as successor in interest to ATLANTIC ASBESTOS CORP.
Lori Elliott Guzman, Esq.
HUNTON & WILLIAMS
Riverfront Plaza, East Tower
951 East Byrd Street
Richmond, VA 23219

ROBERT A. KEASBEY COMPANY
Weiner Lesniak LLP
Anna M. DiLonardo
888 Veterans Memorial Highway
Hauppague, NY 11788

SEQUOIA VENTURES, INC.,
f/k/a BECHTEL CORPORATION
C/O Dan Moretti, Esq
120 Broadway, 27th Flr
New York, NY 12207

THE FAIRBANKS COMPANY
CT Corporation System (GA)
1201 Peachtree Street NE
Atlanta, GA 30361

TREADWELL CORPORATION

McGivney, Kluger & Gannon
C/O Richard E. Leff, Esq.
80 Broad Street, 23rd Floor
New York, NY 10004

U.S. RUBBER COMPANY (UNIROYAL)

c/o Frank Degrim, Esq.
GREENFIELD, STEIN & SENOIR
600 Third Avenue, 11th Floor
New York, NY 10016-1903

UNION CARBIDE CORPORATION

CT Corporation Systems
111 8th Avenue
New York, NY 10019

UNITED CONVEYOR CORPORATION

2100 Norman Drive West
Waukegan, IL 60085

**VIAD CORP., Individually, and as successor in interest to
GRISCOM RUSSEL CO.**

1850 North Central Avenue, Viad Tower
Phoenix, AZ 85077

WARREN PUMPS, INC.

82 Bridges Avenue
Warren, MA 01083

WEIL-MCLAIN,

a division of THE MARLEY COMPANY
500 Blaine Street
Michigan City, IN 46360

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

-----X
ANGELO DEMERI and DORIS DEMERI,

Index No.:

Date Filed:

Plaintiff(s),

-against-

**VERIFIED
COMPLAINT**

A.W. CHESTERTON COMPANY,
AMCHEM PRODUCTS, INC.,
 n/k/a RHONE POULENC AG COMPANY,
 n/k/a BAYER CROPSCIENCE INC.,
AMERICAN STANDARD, INC.,
ANCHOR PACKING COMPANY,
AQUA-CHEM, INC.,
AURORA PUMP COMPANY,
BEAZER EAST, INC.,
 f/k/a KOPPERS INDUSTRIES,
BELL & GOSSETT COMPANY,
BMCE INC.,
 f/k/a UNITED CENTRIFUGAL PUMP,
BORDEN CHEMICAL, INC.,
BORDEN, INC.,
BORG WARNER INDUSTRIAL PRODUCTS,
 a/k/a BW/IP INTERNATIONAL,
BUFFALO PUMPS, INC.,
BURNHAM, LLC,
 Individually, and as successor to
 BURNHAM CORPORATION,
BW/IP INTERNATIONAL, INC.,
 f/k/a BORG WARNER INDUSTRIAL PRODUCTS
 successor to BYRON JACKSON PUMPS,
CARRIER CORPORATION,
 Individually, and as successor in interest to
 BRYANT HEATING & COOLING SYSTEMS,
CBS CORPORATION, a Delaware Corporation,
 f/k/a VIACOM INC. successor by merger to CBS
 CORPORATION, a Pennsylvania Corporation,
 f/k/a WESTINGHOUSE ELECTRIC CORPORATION,
CENTRAL HUDSON GAS & ELECTRIC,
CERTAIN TEED CORPORATION,
CLEAVER BROOKS COMPANY, INC.,
CONSOLIDATED EDISON COMPANY
 OF NEW YORK, INC.,
COURTER & COMPANY INCORPORATED,
CRANE CO.,
CRANE COMPANY,
 Individually and as successor to
 Mark Controls Corporation and as
 successor to Pacific Valves,
CRANE PUMPS & SYSTEMS, INC., WEINMAN DIVISION,

CRANE PUMPS & SYSTEMS, INC.,
as successor to BURKS PUMPS, INC.,
CROLL REYNOLDS ENGINEERING CO., INC.,
DB RILEY, INC.,
DUNHAM-BUSH, INC.,
DURABLA MANUFACTURING COMPANY,
EASTERN REFRACTORIES COMPANY, INC.,
ECOLAIRE INCORPORATED,
ELLIOTT TURBOMACHINERY CO., INC.,
EMPIRE-ACE INSULATION MFG. CORP.,
FAIRBANKS-MORSE PUMP CORPORATION,
FEDERAL PUMP CORPORATION,
FOSTER WHEELER, L.L.C.,
GARDNER DENVER, INC.,
GARLOCK SEALING TECHNOLOGIES LLC,
f/k/a GARLOCK INC.,
GENERAL ELECTRIC COMPANY,
GENERAL MOTORS CORPORATION,
GOODYEAR CANADA, INC.,
GOODYEAR TIRE AND RUBBER COMPANY,
GOULDS PUMPS, INC.,
H.B. FULLER COMPANY,
H.B. SMITH COMPANY, INCORPORATED,
HEXION SPECIALTY CHEMICALS, INC.,
individually and a successor-on-interest to
THE BORDEN'S CONDENSED MILK COMPANY,
THE BORDEN COMPANY, BORDEN, INC. and
BORDEN CHEMICAL, INC.,
IMO INDUSTRIES, INC.,
INGERSOLL-RAND COMPANY,
INTERNATIONAL BUSINESS MACHINES CORPORATION,
ITT INDUSTRIES INC.,
J.H. FRANCE REFRACTORIES COMPANY,
KARNAK CORPORATION,
KENNEDY VALVE MANUFACTURING Co., Inc.,
MILTON ROY COMPANY,
MINNESOTA MINING & MANUFACTURING COMPANY,
OAKFABCO, INC.,
ORANGE & ROCKLAND UTILITIES, INC.,
OWENS-ILLINOIS, INC.,
PATTERSON PUMP COMPANY,
PEERLESS INDUSTRIES, INC.,
PREMIER REFRACTORIES, INC.,
f/k/a ADIANCE, INC., f/k/a BMI,
RAPID-AMERICAN CORPORATION,
RESEARCH CORPORATION,
RESEARCH-COTTRELL, INC.,
REXNORD CORPORATION,

Individually, and as successor to FALK CORPORATION,
REYNOLDS METALS COMPANY,

Individually and as successor in interest to
ATLANTIC ASBESTOS CORP.,
ROBERT A. KEASBEY COMPANY,
SEQUOIA VENTURES, INC.,

f/k/a BECHTEL CORPORATION,
THE FAIRBANKS COMPANY,
TREADWELL CORPORATION,
U.S. RUBBER COMPANY (UNIROYAL),
UNION CARBIDE CORPORATION,
UNITED CONVEYOR CORPORATION,
VIAD CORP., Individually, and as successor in interest to
GRISCOM RUSSEL CO.,
WARREN PUMPS, INC.,
WEIL-MCLAIN,
a division of THE MARLEY COMPANY,

Defendants.

-----X

Plaintiff(s), ANGELO DEMERI and DORIS DEMERI, by their attorneys
WEITZ & LUXENBERG, P.C., upon information and belief, at all times hereinafter mentioned
alleges as follows:

1. Plaintiff(s), ANGELO DEMERI and DORIS DEMERI, by their attorneys,
WEITZ & LUXENBERG, P.C., for their **verified complaint** respectfully alleges:

2. Defendant AQUA-CHEM, INC., was and still is a duly organized
domestic corporation doing business in the State of New York.

3. Defendant AQUA-CHEM, INC., was and still is a duly organized foreign
corporation doing business and/or transacting business in the State of New York and/or should
have expected its acts to have consequences within the State of New York.

4. Defendant AURORA PUMP COMPANY, was and still is a duly
organized domestic corporation doing business in the State of New York.

5. Defendant AURORA PUMP COMPANY, was and still is a duly
organized foreign corporation doing business and/or transacting business in the State of New
York and/or should have expected its acts to have consequences within the State of New York.

6. Defendant BEAZER EAST, INC., f/k/a KOPPERS INDUSTRIES, was
and still is a duly organized domestic corporation doing business in the State of New York.

7. Defendant BEAZER EAST, INC., f/k/a KOPPERS INDUSTRIES, was and still is a duly organized foreign corporation doing business and/or transacting business in the State of New York and/or should have expected its acts to have consequences within the State of New York.

8. Defendant BELL & GOSSETT COMPANY, was and still is a duly organized domestic corporation doing business in the State of New York.

9. Defendant BELL & GOSSETT COMPANY, was and still is a duly organized foreign corporation doing business and/or transacting business in the State of New York and/or should have expected its acts to have consequences within the State of New York.

10. Defendant BORDEN CHEMICAL, INC., was and still is a duly organized domestic corporation doing business in the State of New York.

11. Defendant BORDEN CHEMICAL, INC., was and still is a duly organized foreign corporation doing business and/or transacting business in the State of New York and/or should have expected its acts to have consequences within the State of New York.

12. Defendant BORDEN, INC., was and still is a duly organized domestic corporation doing business in the State of New York.

13. Defendant BORDEN, INC., was and still is a duly organized foreign corporation doing business and/or transacting business in the State of New York and/or should have expected its acts to have consequences within the State of New York.

14. Defendant BORG WARNER INDUSTRIAL PRODUCTS, a/k/a BW/IP INTERNATIONAL, was and still is a duly organized domestic corporation doing business in the State of New York.

15. Defendant BORG WARNER INDUSTRIAL PRODUCTS, a/k/a BW/IP INTERNATIONAL, was and still is a duly organized foreign corporation doing business and/or

transacting business in the State of New York and/or should have expected its acts to have consequences within the State of New York.

16. Defendant BUFFALO PUMPS, INC., was and still is a duly organized domestic corporation doing business in the State of New York.

17. Defendant BUFFALO PUMPS, INC., was and still is a duly organized foreign corporation doing business and/or transacting business in the State of New York and/or should have expected its acts to have consequences within the State of New York.

18. Defendant BW/IP INTERNATIONAL, INC., f/k/a BORG WARNER INDUSTRIAL PRODUCTS successor to BYRON JACKSON PUMPS, was and still is a duly organized domestic corporation doing business in the State of New York.

19. Defendant BW/IP INTERNATIONAL, INC., f/k/a BORG WARNER INDUSTRIAL PRODUCTS successor to BYRON JACKSON PUMPS, was and still is a duly organized foreign corporation doing business and/or transacting business in the State of New York and/or should have expected its acts to have consequences within the State of New York.

20. Defendant CARRIER CORPORATION, Individually, and as successor in interest to BRYANT HEATING & COOLING SYSTEMS, was and still is a duly organized domestic corporation doing business in the State of New York.

21. Defendant CARRIER CORPORATION, Individually, and as successor in interest to BRYANT HEATING & COOLING SYSTEMS, was and still is a duly organized foreign corporation doing business and/or transacting business in the State of New York and/or should have expected its acts to have consequences within the State of New York.

22. Defendant CENTRAL HUDSON GAS & ELECTRIC, was and still is a duly organized domestic corporation doing business in the State of New York.

23. Defendant CENTRAL HUDSON GAS & ELECTRIC, was and still is a duly organized foreign corporation doing business and/or transacting business in the State of

New York and/or should have expected its acts to have consequences within the State of New York.

24. Defendant CRANE COMPANY, Individually and as successor to Mark Controls Corporation and as successor to Pacific Valves, was and still is a duly organized domestic corporation doing business in the State of New York.

25. Defendant CRANE COMPANY, Individually and as successor to Mark Controls Corporation and as successor to Pacific Valves, was and still is a duly organized foreign corporation doing business and/or transacting business in the State of New York and/or should have expected its acts to have consequences within the State of New York.

26. Defendant CRANE PUMPS & SYSTEMS, INC., WEINMAN DIVISION, was and still is a duly organized domestic corporation doing business in the State of New York.

27. Defendant CRANE PUMPS & SYSTEMS, INC., as successor to BURKS PUMPS, INC., was and still is a duly organized domestic corporation doing business in the State of New York.

28. Defendant CROLL REYNOLDS ENGINEERING CO., INC., was and still is a duly organized domestic corporation doing business in the State of New York.

29. Defendant CROLL REYNOLDS ENGINEERING CO., INC., was and still is a duly organized foreign corporation doing business and/or transacting business in the State of New York and/or should have expected its acts to have consequences within the State of New York.

30. Defendant DUNHAM-BUSH, INC., was and still is a duly organized domestic corporation doing business in the State of New York.

31. Defendant DUNHAM-BUSH, INC., was and still is a duly organized foreign corporation doing business and/or transacting business in the State of New York and/or should have expected its acts to have consequences within the State of New York.

32. Defendant ECOLAIRE INCORPORATED, was and still is a duly organized domestic corporation doing business in the State of New York.

33. Defendant ECOLAIRE INCORPORATED, was and still is a duly organized foreign corporation doing business and/or transacting business in the State of New York and/or should have expected its acts to have consequences within the State of New York.

34. Defendant ELLIOTT TURBOMACHINERY CO., INC., was and still is a duly organized domestic corporation doing business in the State of New York.

35. Defendant ELLIOTT TURBOMACHINERY CO., INC., was and still is a duly organized foreign corporation doing business and/or transacting business in the State of New York and/or should have expected its acts to have consequences within the State of New York.

36. Defendant FAIRBANKS-MORSE PUMP CORPORATION, was and still is a duly organized domestic corporation doing business in the State of New York.

37. Defendant FAIRBANKS-MORSE PUMP CORPORATION, was and still is a duly organized foreign corporation doing business and/or transacting business in the State of New York and/or should have expected its acts to have consequences within the State of New York.

38. Defendant FEDERAL PUMP CORPORATION, was and still is a duly organized domestic corporation doing business in the State of New York.

39. Defendant FEDERAL PUMP CORPORATION, was and still is a duly organized foreign corporation doing business and/or transacting business in the State of New York and/or should have expected its acts to have consequences within the State of New York.

40. Defendant GARDNER DENVER, INC., was and still is a duly organized domestic corporation doing business in the State of New York.

41. Defendant GARDNER DENVER, INC., was and still is a duly organized foreign corporation doing business and/or transacting business in the State of New York and/or should have expected its acts to have consequences within the State of New York.

42. Defendant H.B. SMITH COMPANY, INCORPORATED, was and still is a duly organized domestic corporation doing business in the State of New York.

43. Defendant H.B. SMITH COMPANY, INCORPORATED, was and still is a duly organized foreign corporation doing business and/or transacting business in the State of New York and/or should have expected its acts to have consequences within the State of New York.

44. Defendant HEXION SPECIALTY CHEMICALS, INC., individually and a successor-on-interest to THE BORDEN'S CONDENSED MILK COMPANY, THE BORDEN COMPANY, BORDEN, INC. and BORDEN CHEMICAL, INC., was and still is a duly organized domestic corporation doing business in the State of New York.

45. Defendant HEXION SPECIALTY CHEMICALS, INC., individually and a successor-on-interest to THE BORDEN'S CONDENSED MILK COMPANY, THE BORDEN COMPANY, BORDEN, INC. and BORDEN CHEMICAL, INC., was and still is a duly organized foreign corporation doing business and/or transacting business in the State of New York and/or should have expected its acts to have consequences within the State of New York.

46. Defendant IMO INDUSTRIES, INC., was and still is a duly organized domestic corporation doing business in the State of New York.

47. Defendant IMO INDUSTRIES, INC., was and still is a duly organized foreign corporation doing business and/or transacting business in the State of New York and/or should have expected its acts to have consequences within the State of New York.

48. Defendant INTERNATIONAL BUSINESS MACHINES CORPORATION, was and still is a duly organized domestic corporation doing business in the State of New York.

49. Defendant INTERNATIONAL BUSINESS MACHINES CORPORATION, was and still is a duly organized foreign corporation doing business and/or transacting business in the State of New York and/or should have expected its acts to have consequences within the State of New York.

50. Defendant ITT INDUSTRIES INC., was and still is a duly organized domestic corporation doing business in the State of New York.

51. Defendant ITT INDUSTRIES INC., was and still is a duly organized foreign corporation doing business and/or transacting business in the State of New York and/or should have expected its acts to have consequences within the State of New York.

52. Defendant KARNAK CORPORATION, was and still is a duly organized domestic corporation doing business in the State of New York.

53. Defendant KARNAK CORPORATION, was and still is a duly organized foreign corporation doing business and/or transacting business in the State of New York and/or should have expected its acts to have consequences within the State of New York.

54. Defendant KENNEDY VALVE MANUFACTURING Co., Inc., was and still is a duly organized domestic corporation doing business in the State of New York.

55. Defendant KENNEDY VALVE MANUFACTURING Co., Inc., was and still is a duly organized foreign corporation doing business and/or transacting business in the State of New York and/or should have expected its acts to have consequences within the State of New York.

56. Defendant MILTON ROY COMPANY, was and still is a duly organized domestic corporation doing business in the State of New York.

57. Defendant MILTON ROY COMPANY, was and still is a duly organized foreign corporation doing business and/or transacting business in the State of New York and/or should have expected its acts to have consequences within the State of New York.

58. Defendant ORANGE & ROCKLAND UTILITIES, INC., was and still is a duly organized domestic corporation doing business in the State of New York.

59. Defendant ORANGE & ROCKLAND UTILITIES, INC., was and still is a duly organized foreign corporation doing business and/or transacting business in the State of New York and/or should have expected its acts to have consequences within the State of New York.

60. Defendant RESEARCH CORPORATION, was and still is a duly organized domestic corporation doing business in the State of New York.

61. Defendant RESEARCH CORPORATION, was and still is a duly organized foreign corporation doing business and/or transacting business in the State of New York and/or should have expected its acts to have consequences within the State of New York.

62. Defendant RESEARCH-COTTRELL, INC., was and still is a duly organized domestic corporation doing business in the State of New York.

63. Defendant RESEARCH-COTTRELL, INC., was and still is a duly organized foreign corporation doing business and/or transacting business in the State of New York and/or should have expected its acts to have consequences within the State of New York.

64. Defendant REXNORD CORPORATION, Individually, and as sucesor to FALK CORPORATION , was and still is a duly organized domestic corporation doing business in the State of New York.

65. Defendant REXNORD CORPORATION, Individually, and as sucesor to FALK CORPORATION , was and still is a duly organized foreign corporation doing business

and/or transacting business in the State of New York and/or should have expected its acts to have consequences within the State of New York.

66. Defendant THE FAIRBANKS COMPANY, was and still is a duly organized domestic corporation doing business in the State of New York.

67. Defendant THE FAIRBANKS COMPANY, was and still is a duly organized foreign corporation doing business and/or transacting business in the State of New York and/or should have expected its acts to have consequences within the State of New York.

68. Defendant VIAD CORP., Individually, and as successor in interest to GRISCOM RUSSEL CO., was and still is a duly organized domestic corporation doing business in the State of New York.

69. Defendant VIAD CORP., Individually, and as successor in interest to GRISCOM RUSSEL CO., was and still is a duly organized foreign corporation doing business and/or transacting business in the State of New York and/or should have expected its acts to have consequences within the State of New York.

70. Defendant WARREN PUMPS, INC., was and still is a duly organized domestic corporation doing business in the State of New York.

71. Defendant WARREN PUMPS, INC., was and still is a duly organized foreign corporation doing business and/or transacting business in the State of New York and/or should have expected its acts to have consequences within the State of New York.

Plaintiff(s), ANGELO DEMERI and DORIS DEMERI, repeats and realleges NYAL - WEITZ & LUXENBERG, P.C. STANDARD ASBESTOS COMPLAINT FOR PERSONAL INJURY No. 7 as if fully incorporated herein as it pertains to the defendants in the aforementioned caption.

Dated: *September 24, 2007*
New York, New York

Yours, etc.,

WEITZ & LUXENBERG, P.C

Attorneys for Plaintiff(s)
180 Maiden Lane
New York, NY 10038
(212) 558-5500

LAW OFFICES
OF
WEITZ
&
LUXENBERG, P.C.
180 MAIDEN LANE
NEW YORK, N.Y. 10038

STATE OF NEW YORK)

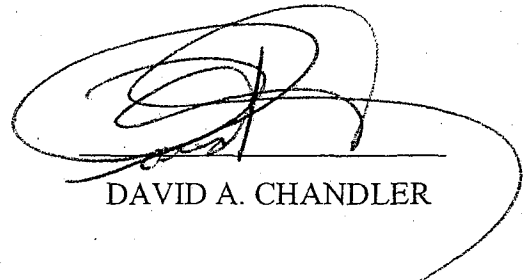
SS:

COUNTY OF NEW YORK)

The undersigned, an attorney admitted to practice in the Courts of New York State, shows:

Deponent is an Associate of the firm WEITZ & LUXENBERG, P.C., Counsel for the plaintiff(s) in the within action; deponent has read the foregoing **summons and verified complaint** and knows the contents thereof; the same is true to deponent's own knowledge, except as to the matters therein stated to be alleged on information and belief, and that as to those matters deponent believes it to be true. This verification is made by deponent and not by plaintiff(s) because plaintiff(s) resides outside of the County of New York where plaintiffs' counsel and deponent maintain their office.

Dated: September 24, 2007
New York, New York



DAVID A. CHANDLER

Index No.: ||2888-07

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

ANGELO DEMERI and DORIS DEMERI,

Plaintiff(s),

-against-

A.W. CHESTERTON COMPANY, et. al.,

Defendants.

SUMMONS and COMPLAINT

WEITZ & LUXENBERG, P.C.
Attorneys for PLAINTIFFS
180 Maiden Lane
New York, NY 10038
212-558-5500

To

Attorney(s) for

Service of a copy of the within
is hereby admitted.

Dated, September 24, 2007

Attorney(s) for